



151 Southhall Lane, Ste 450  
Maitland, FL 32751  
P.O. Drawer 200  
Winter Park, FL 32790-0200  
[www.inteserra.com](http://www.inteserra.com)

June 8, 2018  
Via ECFS Filing

Talk America Services, LLC  
10802 Executive Center Drive Benton Building Suite 300  
Little Rock, Arkansas 72211

FRN: 0023997349  
Secretary, Federal Communications Commission  
Washington, DC 20554  
ATTN: Wireline Competition Bureau

**RE: Talk America Services, LLC  
Application to Discontinue Service**

Dear Sir or Madam:

Enclosed please find the Application to Discontinue Service submitted on behalf of Talk America Services, LLC. This filing is made pursuant to Title 47, Section 63.71.

A copy of this filing has been provided to the Service List provided as Exhibit B.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to [Sthomas@inteserra.com](mailto:Sthomas@inteserra.com). Thank you for your assistance in this matter.

Sincerely,

/s/ Sharon Thomas

Sharon Thomas  
Consultant  
Inteserra Consulting Group (formerly Technologies Management, Inc. (TMI))

tms: FCCx1804

ST/cc

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of )  
Section 63.71 Application of )  
Talk America Services, LLC )  
to Discontinue Services )

File No. \_\_\_\_\_

**Section 63.71 Application of Talk America Services, LLC**

Talk America Services, LLC ("Talk America Services" or "Applicant"), hereby seeks authorization pursuant to Section 214 (a) of the Communication Act of 1934, as amended, and 47 C.F.R. §63.71, to discontinue the provision of exchange access and interstate long distance services in certain locations in the Commonwealth of Virginia and in the states of Maryland and Michigan. This proposed discontinuance will affect approximately 126 existing customers.<sup>1</sup>

Applicant is considered a non-dominant telecommunications carrier with respect to all of its services, including those affected by the proposed discontinuance.

Talk America Services provides the following information pursuant to Section 63.71 of the Commission's rules:

*1. Name and corporate headquarters address of Carrier*

Talk America Services, LLC  
10802 Executive Center Drive  
Benton Building, Suite 300  
Little Rock, AR 72211

*2. Correspondence concerning this Application should be sent to:*

Sharon Thomas  
Consultant to Talk America Services, LLC  
Inteserra Consulting Group, Inc.  
151 Southhall Lane, Suite 450  
Maitland, FL 32751  
Telephone: 407-740-3031  
Facsimile: 407-740-0613  
E-Mail: [stthomas@inteserra.com](mailto:stthomas@inteserra.com)

---

<sup>1</sup> Talk America Services also intends to disconnect local exchange service (dial tone and local usage), digital subscriber line ("DSL") internet access, and intrastate long-distance services to the affected customers. These services are not subject to the FCC's Section 214 discontinuance rules and are, therefore, not included as part of this request for authorization. However, customers are being notified regarding all of the services that are to be discontinued.

3. *Date of Planned Service Discontinuance, Reduction or Impairment:*

Talk America Services proposes to discontinue the services that are the subject of this Application on or about August 1, 2018, pending required federal and state regulatory approval of the discontinuance.

4. *Points of Geographic Areas of Service Affected:*

The services that are the subject of this discontinuance will be discontinued in certain locations in the Commonwealth of Virginia and in the states of Maryland and Michigan. The Applicant does NOT intend to discontinue service to all locations in these states, however, and will continue to offer service where the facilities of its underlying carriers allow.

5. *Brief Description of Types of Service Affected and Reason for Discontinuance:*

Talk America Services proposes to discontinue local exchange service, including exchange access; DSL internet access; and intrastate and interstate long distance services provided to approximately 11 residential customers in Virginia, 102 residential customers in Maryland and 13 residential customers in Michigan. The services subject to the FCC's jurisdiction that are the subject of this request for authorization are exchange access and interstate long distance.

The services are being discontinued because Talk America Services' wholesale service providers in the affected service locations, which are competitive local exchange carrier affiliates of Windstream Services, LLC, intend to decommission certain equipment that is used to serve the affected customers. Talk America Services operates as a reseller of the Windstream affiliates' services and has no ability to provide the same bundle of services to the impacted customers. As described below, Talk America Services is providing all affected customers with ample notice of the discontinuance and has established a dedicated toll-free customer service number to support customers impacted by the discontinuance.

6. *Brief Description of Dates and Methods of Notice to All Affected Customers:*

The Applicant has provided written customer notice of the planned discontinuance in accordance with the requirements of section 63.71 (a) of the Commission's Rules. Notice was provided via 1<sup>st</sup> class U.S. mail to all but one affected customer on May 31, 2018. Notice to a single customer residing in Ellicott City, Maryland

was mailed on June 7, 2018, due to concerns about the flooding that occurred in that area at the end of May. The notices are attached as Exhibit A.

A copy of this Application is being sent to the state regulatory commissions and governors' offices in Virginia, Maryland and Michigan, as well as to the Department of Defense, as required under Section 63.71, concurrent with this filing. A service list is provided in Exhibit B.

**Conclusion**

Talk America Services, LLC respectfully requests that the Commission approve its Section 63.71 Application to discontinue the services described herein. Pursuant to Section 214(a) of the Communication Act of 1934, as amended, and 47 C.F.R. §63.71, Talk America Services understands that this application will be automatically granted on the 31<sup>st</sup> day after the Public Notice is released, with no Commission notification to the Company, unless the Commission has notified the Company that the grant will not be automatically effective.

Dated this 8<sup>th</sup> day of June, 2018.

By: /s/ Jeffrey R. Strenkowski  
Jeffrey R. Strenkowski  
Vice President, Deputy General Counsel of  
Governmental Affairs  
Talk America Services, LLC

Sharon Thomas, Consultant to  
Inteserra Consulting Group, Inc.  
151 Southhall Lane, Suite 450  
Maitland, FL 32751  
Telephone: 407-740-3031  
Facsimile: 407-740-0613  
E-Mail: [stthomas@inteserra.com](mailto:stthomas@inteserra.com)

**Exhibit A**  
**Customer Notice**



2134 W Laburnum Ave. , Richmond, VA 23227

May 31, 2018

Customer Name  
Customer Address  
City, State Zip

**URGENT: Your telephone services will be impacted unless you take action!**

Dear Valued Customer,

Talk America Services, LLC will discontinue offering local exchange (dialtone), digital subscriber line (DSL) internet access and long distance services in certain areas within the Commonwealth of Virginia and the states of Maryland and Michigan on or after August 1, 2018, pending applicable regulatory approvals, due to the decommissioning of equipment by our wholesale service provider. **Your service will be affected by this discontinuance.**

To avoid a **permanent disruption of your telephone services**, please contact Talk America Services at 1-800-962-4772 as soon as possible to discuss your available options for an alternative service provider. Failure to do so may result in insufficient time to transition your services to an alternative provider and could result in the complete loss of your dialtone, internet access and long distance services, including your telephone number, with no short-term ability to restore them. You will need to migrate your telephone service to an alternative provider **before August 1, 2018.**

A filing is being made with the FCC for approval of this discontinuance of service. The FCC will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the §63.71 Application of Talk America Services, LLC. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

Talk America Services' customer service can be reached at 1-800-962-4772 or [customercare@talkamericaservices.com](mailto:customercare@talkamericaservices.com) or in writing at 2134 W Laburnum Ave., Richmond, VA 23227.

Sincerely,  
Talk America Services, LLC



2134 W Laburnum Ave. , Richmond, VA 23227

June 7, 2018

[REDACTED]

[REDACTED]

Ellicott City, MD 21042-2333

**URGENT: Your telephone services will be impacted unless you take action!**

Dear Valued Customer,

Talk America Services, LLC will discontinue offering local exchange (dialtone), digital subscriber line (DSL) internet access and long distance services in certain areas within the Commonwealth of Virginia and the states of Maryland and Michigan on or after August 1, 2018, pending applicable regulatory approvals, due to the decommissioning of equipment by our wholesale service provider. **Your service will be affected by this discontinuance.**

To avoid a **permanent disruption of your telephone services**, please contact Talk America Services at 1-800-962-4772 as soon as possible to discuss your available options for an alternative service provider. Failure to do so may result in insufficient time to transition your services to an alternative provider and could result in the complete loss of your dialtone, internet access and long distance services, including your telephone number, with no short-term ability to restore them. You will need to migrate your telephone service to an alternative provider **before August 1, 2018.**

A filing is being made with the FCC for approval of this discontinuance of service. The FCC will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the §63.71 Application of Talk America Services, LLC. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

Talk America Services' customer service can be reached at 1-800-962-4772 or [customercare@talkamericaservices.com](mailto:customercare@talkamericaservices.com) or in writing at 2134 W Laburnum Ave., Richmond, VA 23227.

Sincerely,  
Talk America Services, LLC

## **Exhibit B – Service List**

Mr. Joel H. Peck, Esq, Clerk of the Commission  
Virginia State Corporation Commission  
Tyler Building, 9th Floor 1300 E. Main Street  
Richmond, Virginia 23219

Office of the Governor  
P.O. Box 1475  
Henrico, VA 23233

David Collins  
Executive Secretary  
Maryland Public Service Commission  
William Donald Schaefer Tower  
6 St. Paul St., 16<sup>th</sup> Floor  
Baltimore, MD 21202

Office of the Governor  
100 State Circle  
Annapolis, MD 21401

Ms. Kavita Kale, Executive Secretary  
Michigan Public Service Commission  
7109 W. Saginaw Highway  
Lansing, MI 48917

Governor Rick Snyder  
P.O. Box 30013  
Lansing, Michigan 48909

U.S. Department of Defense  
Pentagon  
Attn. Special Assistant for Telecom.  
Washington, DC 20301



**CERTIFICATE OF SERVICE**

STATE OF FLORIDA        )

COUNTY OF ORANGE       )

On this date, June 8, 2018, the foregoing Section 63.71 Application was sent by U.S. Mail postage prepaid to the service list contained in Exhibit B.

/s/Keith Rice

For Shipping Department  
Inteserra Consulting Group, Inc.